

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**BASF CORPORATION, as successor in interest to
CIBA CORPORATION,**

Plaintiff,

v.

**AIU INSURANCE COMPANY, ALLIANZ
GLOBAL RISKS US INSURANCE COMPANY,
ALLIANZ VERSICHERUNGS-AG, ALLSTATE
INSURANCE COMPANY, AXA GROUP AG, AXA
INSURANCE COMPANY, EMPLOYERS
MUTUAL CASUALTY COMPANY, FIRST STATE
INSURANCE COMPANY, GRANITE STATE
INSURANCE COMPANY, HDI GLOBAL
INSURANCE COMPANY, HDI GLOBAL SE,
INSCO LTD., INSURANCE COMPANY OF
NORTH AMERICA, INSURANCE COMPANY OF
THE STATE OF PENNSYLVANIA, INTERSTATE
FIRE & CASUALTY COMPANY, NATIONAL
UNION FIRE INSURANCE COMPANY OF
PITTSBURGH, PA, NEW ENGLAND
INSURANCE COMPANY, RSA INSURANCE
GROUP LIMITED, TIG INSURANCE COMPANY,
TRAVELERS CASUALTY & SURETY
COMPANY, TWIN CITY FIRE INSURANCE
COMPANY WESTPORT INSURANCE
CORPORATION and ZURICH INSURANCE
GROUP LTD.,**

Defendants.

**Civil Action No. 2:24-cv-993
(RMG)**

[JOINT PROPOSED] SCHEDULING ORDER

Plaintiff BASF Corporation, as successor in interest to CIBA Corporation (“BASF”) and the AIG Insurer Defendants¹ (collectively, the “Lead Parties”) respectfully submit this Joint Proposed Scheduling Order and agree and request that the Court order as set forth below:

1. All Defendants shall respond to the Amended Complaint by June 28, 2024.
2. If any Defendant moves to dismiss the Amended Complaint, Plaintiff must file any opposition brief by July 26, 2024, and Defendants must file any reply brief by August 9, 2024.

May 30, 2024

COLLINS & LACY, P.C.

/s/ Christian Stegmaier

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Counsel for Defendants AIU Insurance Company, Granite State Insurance Company, Insurance Company of the State of Pennsylvania, and National Union Fire Insurance Company of Pittsburgh, Pa.

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Counsel for BASF Corporation

¹ Defendants AIU Insurance Company, Granite State Insurance Company, Insurance Company of the State of Pennsylvania, and National Union Fire Insurance Company of Pittsburgh, Pa.

SO ORDERED this ____ day of _____, 2024:

Hon. Richard M. Gergel